



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

August 17, 2012

VIA FEDERAL EXPRESS: # 529286512284

John A. Boyd
Thompson & Colegate LLP
for Paul Hubbs Construction Company, Inc.
3610 Fourteenth Street
Riverside, CA 92502

Re: Follow-up Information Request Letter Related to Stringfellow Superfund Site

Dear Mr. Boyd:

We have received and reviewed the January 6, 2012 response to the United States Environmental Protection Agency's ("EPA") November 3, 2011 104(e) Request for Information ("Request") relating to the Stringfellow Superfund Site (the "Site") located in Riverside County, California, that you submitted on behalf of Paul Hubbs Construction Company, Inc. (the "Company"). We appreciate the Company's timely response, and the information provided to date. We would like to request certain additional information based on our review of the Company's response. EPA asks that you respond to the following supplemental requests.

Supplemental Requests:

1. In its January 6, 2012 response to EPA, the Company indicated and provided documentation that its blasting contractor, Baxter Blasting Company (dba M.J. Baxter Drilling Co.), conducted blasting operations at the Site from 2000 to 2006, but did not state who conducted blasting and explosives operations during the entire period of the Company's mining and quarrying operations since 1978. Identify all parties who conducted blasting and explosives operations at the Site on behalf of, or at the request of, the Company from 1978 to 1999, and provide the time period during which each performed such services.
2. Provide a complete list of the explosives and their chemical components used by the Company or its contractors from 1978 to 1999. Provide the time period that the respective explosives were used, and a map showing the locations where the respective explosives were stored and detonated. Provide copies of MSDSs for all explosives.
3. If any substance containing perchlorate was utilized at the Site by the Company's contractors during the 1978 to 1999 time period, provide a complete description of those operations. Indicate the number of explosions per year (1978 to 1999), approximate volume of perchlorate substances

used per explosion at the Site, and the storage and disposal practices in effect during this time period for materials containing perchlorate. Provide copies of all documentation referencing or detailing your contractors' use and disposal of perchlorate-containing substances.

4. Identify and describe the portion(s) of the Site where the Company or its contractor(s) conducted blasting operations during the 1978 to 1999 time period. Provide a scaled map of the Site that includes the locations of any blasts, significant buildings, equipment and geographical features during this time period, and indicate the locations of all chemical and waste storage areas, and the boundaries of mining or quarrying districts and/or individual mines or quarries located within the Site.
5. Provide complete copies of all lease agreements between the Company and the owner(s) of the real property for the period of time during which the Company leased property at the Site.
6. Articles of Incorporation provided by the Company show that it was not incorporated until October 1989, although it had been operating at the Site since 1978. Please describe the form of business organization (e.g., sole proprietorship, partnership, etc.) under which the Company operated from 1978 to 1989.
7. In 1983, a disposal pond was discovered in an area which appears to be located to the east of Pyrite Street and near areas where the Company may have formerly stored vehicles and equipment. Information provided to EPA indicates that this area may have been used by a former operator to dispose of rocket propellant and other substances. To the best of the Company's knowledge, identify the operators who may have used this pond for waste disposal, the time period during which each operator may have used it, the types of substances or wastes disposed at the pond, and all other information the Company may have about this pond area. Please also provide a scaled map showing the location of the disposal pond, and provide copies of all documentation in the Company's possession which relates to this disposal pond.
8. Information provided to EPA indicates that from approximately 1960 to 1980, companies which may have operated as government contractors used perchlorate in the manufacture and testing of explosives, rocket fuel, and other propellants at the Site. To the best of the Company's knowledge, identify any operators at the Site who may have used perchlorate. Provide the time period during which each operated, a map showing the locations of their operations, a description of the type of operations each conducted, and all documentation in the Company's possession which relates to any parties who conducted such manufacturing and testing operations or whose operations may have involved perchlorate-containing substances.

EPA has the authority to request this information pursuant to Section 104(e) of Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. §9604(e). Although we anticipate your cooperation in this matter, please note that failure to comply with EPA's information request, or to adequately justify such failure to respond, may subject you to an enforcement action seeking to compel compliance and collect penalties of up to \$37,500 per day of noncompliance pursuant to Section 104 (e)(5) of CERCLA, 42 U.S.C. Section 9604(e)(5).

Please refer to the Request for definitions and instructions with respect to your response, including instructions as to the assertion of a business confidentiality claim and the determination of the scope of

our request. Those definitions and instructions continue to apply and are hereby incorporated into this supplemental request for information. A copy of the November 3, 2011 Request is enclosed for your convenience.

Please provide your response, in writing, within thirty (30) calendar days of your receipt of this letter. Your response should be directed to:

Keith Olinger, Enforcement Office (SFD-7-5)
U.S. EPA, Region 9
75 Hawthorne St.
San Francisco, CA 94105

If the Company has any questions regarding this letter, please contact Keith Olinger at (415) 972-3125 or olinger.keith@epa.gov. Questions regarding the Site's cleanup status should be directed to the Remedial Project Manager, Julie Santiago-Ocasio, at (415) 972-3525 or santiago-ocasio.carmen@epa.gov. Questions regarding legal matters can be directed to Andrew Helmlinger at (415) 972-3904 or helmlinger.andrew@epa.gov. Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Kathi Moore".

Kathi Moore, Manager
Case Development Cost Recovery Section
Superfund Division

cc: Jay P. Hubbs, President
Paul Hubbs Construction Company, Inc.
3500 Pyrite Street
Riverside, California 92509



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August 21, 2012

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August 21, 2012

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Recipient:

Jay P. Hubbs
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